

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Shea & Gardner 1800 Massachusetts Avenue, N.W. Washington, DC 20036		2. Registration No. 3901
3. Name of foreign principal Iraqi National Congress (INC)	4. Principal address of foreign principal Flat J, Hyde Park Street London, UK W22IN	

5. Indicate whether your foreign principal is one of the following:

- ☐ Foreign government
- ☒ Foreign political party
- ☐ Foreign or domestic organization: If either, check one of the following:
- | | |
|--------------------------------------|---|
| <input type="checkbox"/> Partnership | <input type="checkbox"/> Committee |
| <input type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group |
| <input type="checkbox"/> Association | <input checked="" type="checkbox"/> Other (specify) <u>unincorporated association</u> |
- ☐ Individual-State nationality _____

CRM/ISS
REGISTRATION UNIT
200 OCT 31 PM 5:16

6. If the foreign principal is a foreign government, state:

- a) Branch or agency represented by the registrant. N/A
- b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

- a) Principal address.
- b) Name and title of official with whom registrant deals. See Insert
- c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

N/A

b) Is this foreign principal

Supervised by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Directed by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Financed by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐


Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

N/A

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

See Insert

Date of Exhibit A October 31, 2000	Name and Title Collette C. Goodman Partner	Signature 
---------------------------------------	--	---

Shea & Gardner
Registration No. 3901
Insert to Exhibit A for the INC

7. If the foreign principal is a foreign political party, state:

a) Principal address:

Flat J, Hyde Park Street
London, UK W22IN

b) Name and title of official with whom registrant deals:

None. Shea & Gardner deals with officials of the Iraqi National Congress Support Foundation, an agent of the Iraqi National Congress (INC) as to which Shea & Gardner has contemporaneously filed under FARA.

c) Principal aim:

The webpage of the INC states that the INC "is uniting all opposition forces to work towards the common objectives of saving the Iraqi people from their long national tragedy, while at the same time ensuring the territorial integrity and independence of the nation under a democratic, constitutional, parliamentary and pluralistic structure. In order to accomplish these goals the INC presents a credible political alternative for all the Iraqi people without prejudice or differentiation and with full representation of all groups and communities within the population, including Sunnis, Shias, Kurds, Christians and all other minorities."

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

Shea & Gardner believes that the INC is itself a foreign political party within the meaning of § 1(f) of the FARA, 22 U.S.C. § 611(f). However, we also have checked "other" under question 5 because the INC is in fact organized as an unincorporated association with formal Articles of Association.

CRM/ISS
REGISTRATION UNIT
200 OCT 31 PM 5:16

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. One original and two legible photocopies of this form shall be filed for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Shea & Gardner

2. Registration No.

3901

3. Name of Foreign Principal

Iraqi National Congress (INC)

Check Appropriate Boxes:

4. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.

5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.

6. ☒ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.

See Insert

7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

See Insert

CRM/ISS
REGISTRATION UNIT
200 OCT 31 PM 5:16


8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

See Insert

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☐ No ☒

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

See Insert

Date of Exhibit B October 31, 2000	Name and Title Collette C. Goodman Partner	Signature 
---------------------------------------	--	---

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political interests, policies, or relations of a government of a foreign country or a foreign political party.

6. ☒ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.

Shea & Gardner has an attorney-client relationship with the Iraqi National Congress Support Foundation (INCSF), a Delaware non-profit corporation established to provide administrative, financial and other support to the Iraqi National Congress (an Iraqi democratic opposition organization designated by President Clinton pursuant to the Iraq Liberation Act, Pub. L. 105-338; *see* 64 Fed. Reg. 6781 (Feb. 4, 1999)), to promote the transition to democracy and respect for human rights in Iraq, and to provide humanitarian relief in that country. Shea & Gardner's agreement or understanding with the INCSF is fully described in the Exhibit B filed contemporaneously to satisfy Shea & Gardner's obligation to register under the FARA with respect to its representation of the INCSF. Shea & Gardner is filing this Exhibit B for the INC only because of the close relationship between the INCSF and the INC, and because any of its registrable activities on behalf of the INCSF will be or may be deemed to be ultimately for the benefit of the INC. Shea & Gardner's understanding is that, to the extent that any of its registrable actions may be for the benefit of the INC, any directions with respect to those actions will come from the INCSF or its officials.

7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

As explained in our answer to question 6, Shea & Gardner has been engaged to provide legal services to the INCSF, as fully described in the Exhibit B filed by Shea & Gardner with respect to the INCSF. Such services may benefit the INC because of the relationship between the two organizations.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

See our answer to question 7.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below [footnote omitted]. Yes ☐ No ☒

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

While we believe the answer to this item to be "No," because Shea & Gardner does not expect to engage in lobbying members of Congress or their staffs on any issue of general policy or, indeed, on any issue whatsoever, and it does not expect to engage in lobbying any foreign policy officials of the United States government on issues of U.S. foreign or domestic policy, such as U.S. policy concerning Iraq. Shea & Gardner does expect, however, that its partners or associates (other than any partner or associate who is under the restraint of Executive Order 12834 of January 20, 1993 or any similar restraint) will be called upon, from time to time, to discuss legal matters relevant to the operations of the INCSF and thus to the interests of the INC with officials of the Department of State, the Department of Justice, and other governmental agencies, and possibly to submit written materials to such officials. Shea & Gardner does not believe that any of these activities will properly be deemed "political activities" as defined in § 1(o) of the Act, 22 U.S.C. § 611(o). Shea & Gardner believes instead that its obligation to register stems from the anticipated activities in contacting certain government officials that may be deemed to come within § 1(c)(1)(iv) of the Act, 22 U.S.C. § 611(c)(1)(iv) ("within the United States represents the interests of such foreign principal before any agency or official of the Government of the United States"), but it recognizes that the difference between its representational activities and "political activities" may, in the nature of things, not always be crystal clear. Moreover, Shea & Gardner expects that much of its activities will come

CRM/ISS
REGISTRATION UNIT
200 OCT-31 PM 5:16

within the exemption for legal representations by lawyers provided by Section 3(g) of the Act, 22 U.S.C. § 613(g), it cannot be sure that all of its activities will come within that exemption. Similarly, while some of the activities of the INCSF for the benefit of the INC will come with the exemption for humanitarian aid provided by Section 3(d)(3) of the Act, 22 U.S.C. § 613(3)(d)(3), Shea & Gardner does not expect that all of its activities will be in connection with INCSF activities of that kind, and hence it is registering under the Act on behalf of the INCSF and the INC.